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Rec'd 3/31/89

March 29, 1989

Mr. Raymond Basso, Chief
New Jersey Compliance Branch
United States Environmental Protection Agency
Region II
Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

Dear Mr. Basso:

I am in receipt of your March 24, 1989 letter providing comments on ERM's "Interim Status Report for Phase II" of the Feasibility Study, and am writing to you to register my own comments.

1. We have a basic disagreement on the level of detail required for a cost estimate. If you expect cost estimates of $\pm 25\%$ accuracy, a basic process design package would be required for each alternative. This is absolutely unreasonable for Phase III of a FS, say nothing of Phase II. We shall do our best to provide as many details as we can in the FS, especially those you requested, but our emphasis must be on completing the FS and not providing details at a level beyond that required for a FS.
2. Treatability tests were conducted specifically because the use of engineering calculations based on the laws of physical chemistry cannot be considered reliable for the SCP/Carlstadt site, because of the number of chemicals present and the variation of their properties. Henry's law, for example, simply cannot be expected to hold true. In many cases, it would be unwise to attempt to forecast performance of treatment units, in the absence of treatability test results, as suggested in your comment on section 2.1.1.
3. I continue to question EBASCO's suggestion that the removal of suspended solids would help oxidation of ground water in GW-3. I think it is quite likely that the presence of suspended solids may actually aid in the mass transfer operation and thereby improve oxidation process. Is EBASCO's opinion supported by a technical reference?

Please rest assured that we shall do our best to incorporate all of your comments in the FS/FOU.

Sincerely,

H. Gilbert Weil

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